

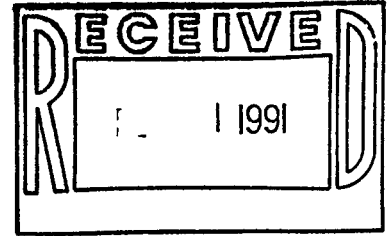


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

JAN 29 1991



Ref 8HWM-FF

Mr. Robert M. Nelson, Jr., Manager
Department of Energy
Rocky Flats Office
P. O. Box 928
Golden, Colorado 80402-0928

RE: Community Relations Plan

Dear Mr. Nelson:

Enclosed are EPA's comments on the final Draft Community Relations Plan. Please incorporate these changes before the document is released for public comment.

EPA is satisfied that with the inclusion of these comments as well as those submitted by the Colorado Department of Health the Draft Community Relations Plan will be ready for the public comment period.

If you or members of your staff have any questions regarding EPA's comments, please contact Mr. Martin Hestmark, Rocky Flats Team Leader, at (303) 294-1134 or Ms. Sonya Pennock, Community Relations Coordinator, at (303) 294-1115.

Sincerely,

A handwritten signature in cursive script that reads "Lou Johnson".

Louis W. Johnson, Chief
Federal Facilities Branch

Enclosure

cc: w/enc.
Martin Hestmark, 8HWM-FF
Sonya Pennock, 80EA
Gary Baughman, CDH
Ann Lockhart, CDH
Beth Brainard, DOE
Terry Smith, EG & G
Frazer Lockhart, DOE
Tom Greengard, EG & G

ADMIN RECORD

A-SW-000096



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Ref: 80EA

COMMENTS ON FINAL DRAFT
ROCKY FLATS COMMUNITY RELATIONS PLAN

General Comments:

This is a good plan! For the most part, DOE has incorporated EPA's previous comments to EPA's satisfaction. One word of caution: Throughout the document there are paragraphs that sound very defensive--as if the plant is trying to justify its actions. There may be adverse public reaction to some of this language. The purpose of the Community Relations Plan is to identify public concerns, not to provide a defense for the government. It is not a public relations document.

As a matter of EPA style "ground water" is two words as a noun and hyphenated (ground-water) as an adjective.

Below are listed our final comments. With the incorporation of these comments, the document should be ready to go out for public comment.

A. Overview

p. 1, final paragraph: At the end of the paragraph please add the following: "CERCLA also applies to releases from treatment, storage and disposal facilities that pose a threat to human health or the environment."

p. 3, fourth paragraph: Insert "of the" between "remainder" and "Rocky Flats Plant Community Relations Plan".

B. Site Description

p. 7, last paragraph, last sentence: Remove "did".

p. 8, second paragraph, last sentence: place "further" at the end of the verb to read: "will be investigated further."

p. 9, third paragraph: Change to reflect the fact that the IAG has been signed.

p. 9, 5th paragraph, last sentence: Change to read, "The IAG list of contaminants (or hazardous substances) is included....".

p. 11, first paragraph, second sentence: There should be a space between "information" and "about".

p. 11, second paragraph, first sentence: Change to read:
"Extensive environmental monitoring of the site currently seems to indicate that the ground-water contamination ..."

Also, this paragraph is somewhat misleading. You indicate that ground-water contamination has not spread off-site. However, ground water can seep to the surface and these surface seeps enter drainages that go off-site.

p. 14, fourth paragraph. Please add a sentence which indicates that DOE is committed to finding ways to provide the community with an opportunity to have input in the environmental restoration decision-making process.

D. Objectives

. Enhance Public Knowledge.

Please indicate that the public also lacks an understanding of the cleanup process.

Community Relations Activities

p. 21, **Meet RCRA, CERCLA and IAG Requirements.** This paragraph refers to the "draft" IAG. Please remove "draft".

p. 22, **Information Repositories.** In addition to the documents required by the IAG, information repositories also contain copies of CERCLA, RCRA, CHWA, NCP, IAG, news releases, fact sheets, TAG information, and relevant guidance documents like the EPA Community Relations Handbook.

p. 23, **Administrative Record:** Please alter this sentence by adding the parenthetical statement that while the Administrative Record is not yet available, it will be available as indicated by the time the CRP is final.

p. 26, second paragraph, first sentence: What will the direct mail notice do? Its purpose seems to be to notify people of the availability of a document. Please clarify.

p. 28, **Dispute Resolution.**, last sentence in first paragraph: Please change to read: "Upon resolution of the dispute by the Dispute Resolution Committee, non-lead agencies who disagree with the decision may take the dispute to the Senior Executive Committee..."

Second paragraph under **Dispute Resolution**, second sentence: The CRP indicates that the Environmental Restoration Update will be published twice a month. It was EPA's understanding that the goal was to issue the Update every two months.

p. 30, Revision of the Community Relations Plan. EPA is in the process of developing a policy that indicates that CRPs should be reviewed and updated, if necessary, at least every two years.

p. 31, Environmental Restoration Updates., This conflicts with the information on updates on p. 28. Please clarify.

List of Contacts, News Media: I believe Mark Obmascik has replaced Mary George at the Denver Post.